

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS, ILLINOIS**

ST. CLAIR COUNTY, ILLINOIS,

Case No.: 21-CV-251

Plaintiff,

Vs.

MCKINSEY & COMPANY, INC.

AND

NAHEED T. BASHIR, M.D.,

Defendant

MOTION TO DISMISS pursuant to FRCP 12(b)

Comes now defendant, Naheed T Bashir MD. And moves the honorable Court to dismiss the plaintiff's complaint on the following grounds.

1. The allegations as stated in the complaint against the defendant are vague and ambiguous.
2. The allegations do not state a claim on which relief can be granted to the plaintiffs.

3. Defendant has been mentioned in the following paragraphs of the complaint: 195, 209, 219, 222, 231, 233, and 235.
4. A bare reading of the allegations stated in the complaint reflect no mention of any patient or prescription. The complaint is based upon the false assumptions which makes is impossible for the defendant to answer the vague and assumed allegations with the facts from the records kept in defendants office.

WHEREOF the defendant respectfully prays to the court to dismiss the plaintiff's complaint with cost and grant defendant any other appropriate relief as deemed fit by the court.

Respectfully submitted


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Defendant

Certificate of service

It is certified that a copy has been served electronically to the parties.



By and through



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